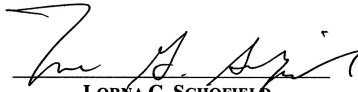




Pillsbury Winthrop Shaw Pittman LLP  
31 West 52nd Street | New York, NY 10019-6131 | tel 212.858.1000 | fax 212.858.1500



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Kenneth W. Taber  
tel: +1.212.858.1813  
kenneth.taber@pillsburylaw.com

November 22, 2024

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Judge  
500 Pearl Street  
New York, New York 10007

Plaintiff shall file a response to  
Defendants' pre-motion letter  
by **December 5, 2024**.

Dated: November 25, 2024  
New York, New York

**Re: *Talenthub Worldwide, Inc. v. Talenthub Workforce, Inc.*, Case No. 24 Civ.  
6264 (LGS)**

Dear Judge Schofield,

We write on behalf of Defendants, pursuant to Rule III of Your Honor's Individual Rules and Procedures in Civil Cases, to request a conference for leave to file a motion to dismiss the Amended Complaint of Plaintiff Talenthub Worldwide, Inc.'s ("Plaintiff" or "Worldwide") (Dkt. 41), pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).<sup>1</sup> As detailed below, the Amended Complaint does nothing to cure the fatal defects in the original Complaint; if anything, it contains several new allegations that buttress the bases for dismissal.

**Background**

The story here begins with Glass' reprehensible 2021 behavior – all admitted in his pleadings in New York Supreme Court – which the Amended Complaint only obliquely acknowledges as "a mental health crisis . . . requiring hospitalization." Dkt. 41 ¶ 135. Specifically, Glass admits to:

- "us[ing] racial, religious and sexual slurs against [Defendants] Kampel, Porembski and/or West" (*Goldstein v. Glass*, Index No. 654474/2023, NYSCEF No. 42 ¶ 7);
- leaving voicemails calling Defendant West a "fucking ugly fucking nigger" and Defendant Goldstein's adult daughter a "fucking cunt" (*Id.*, NYSCEF No. 2 ¶ 46);
- calling Defendant West an "ugly piece of shit" in an email (*Id.* ¶ 47);
- making death threats against Defendant Goldstein (*Id.* ¶ 50); and
- castigating Defendant Goldstein's "self-hating Jewish in-laws" and calling his adult sons "mentally deficient" in an email (*Id.* ¶ 55).

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<sup>1</sup> Capitalized terms not defined herein have their meaning as in the Complaint. Pursuant to Individual Rule III(C)(2), we propose the following briefing schedule for Defendants' motion: opening brief due 30 days after any decision granting this letter request; response brief due 30 days thereafter; reply brief due 21 days thereafter.